

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Tara C. Andrews,

Plaintiff,

v.

**Equifax Information Services LLC,
Experian Information Solutions Inc, and
Trans Union LLC,**

Defendants.

CAUSE NO:

Complaint

Jury demand

1. The Court has jurisdiction pursuant to 15 USC section 1681p. Venue is proper in the Western District of Washington.

2. Tara C. Andrews ("plaintiff") brings this action for damages based upon defendants' violations of the Fair Credit Reporting Act, 15 U.S.C § 1681 *et seq.* ("FCRA").

3. Plaintiff is a resident of King County Washington. Plaintiff is a "consumer" as defined by 15 USC section 1681a(c).

1 4. Equifax Information Services LLC (“Equifax”) is a company licensed to do business in the
2 State of Washington.

3 5. Equifax is a consumer reporting agency, as defined in section 1681(f) of the FCRA,
4 regularly engaged in the business of assembling, evaluating, and dispersing information concerning
5 consumers for the purpose of furnishing consumer reports, as defined in section 1681a(d) of the FCRA.
6

7 6. Experian Information Solutions Inc. (“Experian”) is a company licensed to do business in
8 the State of Washington.

9 7. Experian is a consumer reporting agency, as defined in section 1681(f) of the FCRA,
10 regularly engaged in the business of assembling, evaluating, and dispersing information concerning
11 consumers for the purpose of furnishing consumer reports, as defined in section 1681a(d) of the FCRA.
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13 8. Trans Union LLC (“Trans Union”) is a company licensed to do business in the State of
14 Washington

15 9. Trans Union is a consumer reporting agency, as defined in section 1681(f) of the FCRA,
16 regularly engaged in the business of assembling, evaluating, and dispersing information concerning
17 consumers for the purpose of furnishing consumer reports, as defined in section 1681a(d) of the FCRA.
18

19 10. Defendants Equifax, Experian and Trans Union have each separately prepared and
20 issued consumer credit reports concerning plaintiff that include inaccurate information. Plaintiff
21 notified defendants that she disputed the accuracy of the information defendants were reporting.
22 Defendants separately continued to report inaccurate information.
23

24 11. As a result of defendant’s failure to comply with the requirements of FCRA, plaintiff has
25 suffered, and continues to suffer, actual damages, including economic loss, denial of credit,
26 increased cost of credit, lost opportunity to receive credit, damage to reputation, invasion of
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1 privacy, emotional distress, and interference with normal and usual activities for which plaintiff
2 seeks damages in an amount to be determined by the jury. Plaintiff also seeks punitive damages.

3 12. Plaintiff requests attorney's fees pursuant to 15 U.S.C. § 1681n(a) and § 1681o(a).

4 **Statement of Claims Against Equifax**

5 13. Equifax willfully and/or negligently failed to comply with the requirements of the Fair
6 Credit Reporting Act, including but not limited to § 1681e(b), § 1681b, and § 1681i.
7

8 **Statement of Claims Against Experian**

9 14. Experian willfully and/or negligently failed to comply with the requirements of the Fair
10 Credit Reporting Act, including but not limited to § 1681e(b), § 1681b, and § 1681i.
11

12 **Statement of Claims Against Trans Union**

13 15. Trans Union willfully and/or negligently failed to comply with the requirements of the Fair
14 Credit Reporting Act, including but not limited to § 1681e(b), § 1681b, § 1681c-2, and § 1681i.
15

16 **Trial By Jury Demanded**

17 Plaintiff demands trial by jury.

18 **Prayer For Relief**

19 THEREFORE, plaintiff prays that the Court grant the following relief against each
20 defendant:

- 21 a) actual damages;
22 b) statutory damages;
23 c) punitive damages;
24 d) attorney's fees; and
25 e) costs.
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Respectfully submitted,

DATED this 23rd day of May, 2008.



Christopher E. Green
Attorney for plaintiff